Before the Federal Communications Commission

Washington, D.C. 20554

In the Matter of	*)*	
Delete, Delete, Delete	*)*	*GN Docket No. 25-133*
Modernization of	*)*	
Broadcast Regulations	*)*	
	)	
*Re: 47 C.F.R. §74.1231(*b)	*)*	

To: The Commission

Comments of Pensacola Christian College, Inc.

Pensacola Christian College, Inc., a Florida non-profit corporation, provides higher educational opportunities for undergraduate and graduate students through Pensacola Christian College in Pensacola, Florida. It is the licensee of five (5) operating non-commercial educational full-service FM stations, with a construction permit for another full-service station (each an "*NCE*" station) and 35 FM translators delivering the educational programming of the primary stations.

Pensacola Christian College submits these comments to urge the Commission to revised the outdated and burdensome rules in 47 C.F.R. §74.1231(b), to delete the "*over-the-air*" ("OTA") reception requirement for FM translators operating in the *"unreserved"* portion of the FM band which rebroadcast co-owned NCE stations. This change deleting an unnecessary provision in the rule serves the public interest by ensuring reliable delivery of NCE stations' programming and enabling non-commercial educational stations to reallocate the monetary resources required by compliance with the unnecessary rule provision for use for educational purposes to serve the listening public.

More specifically, 47 C.F.R. §74.1231(b) of the Commission's rules includes the sentence:

> *... An FM booster station or a noncommercial educational FM translator station that is* ***operating on a reserved channel (Channels 201-220) and is*** *owned and operated by the licensee of the primary noncommercial educational station it rebroadcasts may use alternative signal delivery means, including, but not limited to, satellite and terrestrial microwave facilities.*

Pensacola Christian College in these Comments urges revision of the rule to remove the phrase, which is bold highlighted and underlined above *("operating on a reserved channel (Channels 201-220) and is"),* as the deletion will allow each NCE AM and FM station to deliver programming to its co-owned NCE FM booster or FM translator stations regardless of the operating frequency of the FM booster or FM translator station by alternative signal delivery means, including, for example, satellite, terrestrial microwave facilities, or Internet delivery. The referenced phrase in the present rule is not in the public interest as compliance with the required OTA provision as to FM translators operating on the unreserved FM band is in many situations reducing signal quality which impedes reliable delivery of NCE stations' programming to the public and imposes unnecessary expenses on NCE licensees.

As an example of the benefits of the proposed revision of the rule, Pensacola Christian College is licensee of an FM Translator in the "*unreserved*" (92.1 to 107.9 MHz) portions of the FM band in Lafayette, Indiana. Compliance with the OTA requirement in 47 C.F.R. §74.1231(b) results at times in a less desireable, rough, OTA audio signal to the Lafayette translator. Elimination of the OTA requirement in 47 C.F.R. §74.1231(b) will enable a clearer, more dependable audio signal benefiting listeners. Further, Pensacola Christian College must expend $8,000 a year in rent, $600 for a cell device, and approximately $2000 a year in technical engineering fees for a total of $10,600 in annual expenses. Those reoccurring annual expenditures, which will continue

to increase, would be better used each year for Pensacola Christian College's educational mission.

Conclusion

For the foregoing reasons, the proposed revision of 47 C.F.R. §74.1231(b) to moderinize the FM translator rules will ensure quality reception of NCE stations' educational programming by the listening public to better serve the public interest, and will reduce unnecessary expensive burdens on NCE stations allowing redirection of those funds for educational purposes which will be in the public interest.

Respectfully submitted,

Pensacola Christian College, Inc.

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